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**From:** Yalung, Michelle [Michelle.Yalung@meritenergy.com]  
**Sent:** 4/9/2021 12:38:43 PM  
**To:** Wang, Gary [wang.gary@epa.gov]  
**Subject:** RE: Tribal Well Frac Notices

Good morning Gary – Thank you so much for the thorough explanation. Merit is the first company that I have worked for with Tribal wells, so it really can be confusing for me.

Happy Friday and have a great weekend!

Best regards,

**Michelle Yalung**

Regulatory Analyst | South Rockies | Merit Energy Company  
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**From:** Wang, Gary <wang.gary@epa.gov>  
**Sent:** Thursday, April 8, 2021 6:39 PM  
**To:** Yalung, Michelle <Michelle.Yalung@meritenergy.com>  
**Subject:** RE: Tribal Well Frac Notices

Hi Michelle,

Good Question! Overall, EPA classify frack jobs as workover, so the notification/reporting requirements are most frequently referenced in our workover requirements.

The workover notification/reporting requirements are different between permitted and rule-authorized wells. Since Merit has a mix of these permitted, and rule authorized injection wells, I'm providing the answer for each of the classifications.

For Permitted wells, notification and reporting requirements are specified in each of the well's individual permits. I screened a few of Merit's injection well permits and in general, workover notification is required if it affects mechanical integrity (i.e. if Merit by chance may be pulling tubing & packer for the work). Otherwise, submitting the subsequent workover report is sufficient. If it does affect tubing/casing/packer, we'd also want to see a follow up MIT test be conducted, and EPA approval is needed to resume injection on the well.

For Rule Authorized wells, workover notification appear to be required only if there may be an alteration of the well. For reference, Merit's rule authorized injection wells will have a EPA ID beginning with "WY20000". EPA does have a general provision to require any information to assess well compliance, so it would be appreciated if the subsequent report is submitted. Again, if the work happens to affect tubing/casing/packer, we'd also want to see a follow up MIT test, and EPA approval is needed to resume injection on the well.

Hope this answers your question. Please let me know if you have any questions on this email.

Gary Wang  
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**From:** Yalung, Michelle <[Michelle.Yalung@meritenergy.com](mailto:Michelle.Yalung@meritenergy.com)>  
**Sent:** Thursday, April 8, 2021 2:47 PM  
**To:** Wang, Gary <[wang.gary@epa.gov](mailto:wang.gary@epa.gov)>  
**Subject:** Tribal Well Frac Notices

Hi Gary – Are operators required to provide notice of intent to EPA prior to fracking a Tribal well?

Best regards,

**Michelle Yalung**

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